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April 13, 2022

By ECF

Hon. Paul G. Gardephe, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York 10007

Re: *Ebony Ison v. Hotel Riu Republica and Riu Hotel & Resorts*
Case No. 1:22-CV-00324-PGG
Letter Motion for **(1)** Extension of Time to Respond to Complaint
and **(2)** Adjourn May 19, 2022 Pretrial Conference (On Consent)

Dear Judge Gardephe,

The undersigned was recently retained to represent the entity that owns and operates Hotel Riu Republica, the hotel identified as one of the defendants in this action. We understand that the other named defendant, Riu Hotels & Resorts, is not a legal entity.

Extension of Time to Respond to Complaint or Otherwise Move. We write to request a forty-five (45) day extension of time to respond to the Complaint [ECF No. 2] (“Complaint”) or otherwise move, through and including June 2, 2022. This extension is requested because Blank Rome LLP was recently retained and requires time to review the file, investigate the merits and defenses, and to prepare an appropriate response. Plaintiff’s counsel consents to the request, and this is the first request for an extension. A stipulation reflecting the agreement of the parties is annexed hereto as Exhibit A.

Adjournment of May 19, 2022 Pretrial Conference. Given the requested extension of time to respond to the Complaint, through June 2, 2022, the parties request a corresponding adjournment of the May 19, 2022 Pretrial Conference. Based on existing conflicts, the parties propose that it be rescheduled to July 14, 2022, July 21, 2022, July 28, 2022, or as thereafter convenient to the Court.

Thank you for your consideration.

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Respectfully submitted,

/s/ Hilary F. Korman

Hilary F. Korman

cc: By ECF
All Parties of Record

Memo Endorsed: Defendant will answer or otherwise respond to the Complaint by June 2, 2022. The initial pre-trial conference scheduled for May 19, 2022 is adjourned to July 21, 2022 at 10:45 a.m. in Courtroom 705 of the Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, New York.

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: April 19, 2022